

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**SUPPLEMENTAL DECLARATION OF PATRICK FITZGERALD IN SUPPORT OF  
APPLICATION OF DEBTORS FOR AUTHORITY TO RETAIN AND EMPLOY  
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AS SPECIAL COUNSEL TO  
THE DEBTORS *NUNC PRO TUNC* TO THE PETITION DATE**

I, Patrick Fitzgerald, declare:

1. I am a partner in the law firm of Skadden, Arps, Slate, Meagher & Flom LLP (together with its affiliates, “Skadden” or the “Firm”), special counsel to the above-captioned debtors (the “Debtors”) in the above-captioned bankruptcy cases, which maintains an office for the practice of law at, among other places, 155 N. Wacker Drive, Chicago, Illinois 60606.

2. I am a practicing member in good standing of the bars of the States of Illinois and New York. I am admitted to practice before the United States Supreme Court, the United States District Courts for the Southern and Eastern Districts of New York, the Northern

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P., Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

District of Illinois, the Northern District of Indiana, and the Eastern District of Wisconsin, as well as the United States Court of Appeals for the Second Circuit.

3. I submit this declaration (this “Supplemental Declaration”) to supplement the disclosures in my declaration dated November 5, 2019 [Docket No. 438] (the “Initial Declaration”) in support of the Debtors’ Application for Order Under 11 U.S.C. § 327(e) Authorizing Employment of Skadden, Arps, Slate, Meagher & Flom LLP and Affiliates as Special Counsel *Nunc Pro Tunc* to the Petition Date (the “Application”).<sup>2</sup> In the Initial Declaration, Skadden, Arps previously disclosed its current or past representations in unrelated matters of parties or potential parties in these Chapter 11 Cases, or their affiliates.

4. The facts set forth below are based either upon my personal knowledge, discussions with other partners, counsel and associates of Skadden, and client/matter records of Skadden reviewed by myself or by associates of Skadden acting under the supervision and direction of Skadden partners working with me on this task, and if called as a witness I would testify competently thereto.

5. Since the filing of the Initial Declaration, Skadden has engaged in further inquiry of its partners, counsel, and associates with respect to the matters contained in the Initial Declaration, and has continued to conduct further periodic checks with respect to newly-identified persons and parties in interest in these Chapter 11 Cases.

6. As a result of such investigations, Skadden discloses that, in addition to the entities or individuals previously disclosed in the Initial Declaration, Skadden currently represents, or has represented, the following parties or an affiliate thereof in matters unrelated to the Debtors: Pharma Associates L.P., State Of New York Department Of Health, Pharmaceutical

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

Research Associates, Inc., County Of Nassau, Department Of Veterans Affairs, DOD Tricare Management Activity, United States Treasury, Michigan Department Of Treasury, United States Drug Enforcement Administration, United States Food And Drug Administration, United States Internal Revenue Service, Intl Business Machine Corp, Liberty Mutual Insurance Group, Pension Benefit Guaranty Corp, Evonik Corporation, and Rhodes Associates L.P.

7. In conducting further diligence, Skadden worked with certain of the Debtors' other professionals retained in this Chapter 11 Case (the "Professionals") to identify:

(a) parties (and their attorneys) that have filed for the first time notices of appearance, motions, objections, or other pleadings in these Chapter 11 Cases as of April 15, 2020;

(b) any additional purported claimants who filed a claim(s) in these Chapter 11 Cases as of April 15, 2020; and

(c) other parties in interest not otherwise included, based on review of the Professionals' and public records.

8. In addition, Skadden makes the following disclosures:

- (a) **Purdue Pharma LP Sublease.** Skadden subleased space that it leased in its offices located at 1420 New York Avenue, NW, Washington, DC to Purdue Pharma L.P. from January 29, 2018 until April 30, 2020, the effective date of termination of the sublease. At the time of termination, rents from the foregoing sublease were \$4,996.99 per month.

9. Skadden, Arps will continue to conduct due diligence and will file additional supplemental declarations to the extent necessary.

*[Remainder of Page Intentionally Left Blank]*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information, and belief, and after reasonable inquiry.

Dated: Chicago, Illinois  
May 26, 2020

/s/ Patrick Fitzgerald  
Patrick Fitzgerald

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